

III. REMARKS

Claims 1, 4-5, 7-9, 11, 14-15 and 17-22 are pending in this application. By this Amendment, claims 1, 4-5, 7, 9, 11, 14-15 and 17-22 have been amended. Support for these amendments may be found in Applicant's original Specification, for example, at pages 6-7. Applicant is not conceding in this application that the amended claims are not patentable over art cited by the Examiner, as the present claim amendments are for facilitating expeditious allowance of the claimed subject matter. Further, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1, 4, 7-9, 11, 14 and 17-22 are rejected under 35 USC 103(a) as being allegedly being unpatentable over Ramachandran et al. (US 2003/0084343, "Ramachandran") in view of Hay (US 2002/0120868). Claims 5 and 15 are rejected under 35 USC 103(a) as allegedly being unpatentable over Ramachandran in view of Hay, and in further view of Muratov et al. (US 2003/0097596, "Muratov"). Applicant respectfully requests withdrawal of the rejections.

With respect to the rejections, Applicant respectfully reiterates the arguments made in the Amendment of 4 September 2009. Applicants have amended the claims herein solely to further prosecution of this application, which has been pending since 22 September 2003, and received a first Office Action on 9 May 2007, nearly three (3) full years ago. Applicant further notes that a Pre-Appeal Brief Conference Request (11 January 2008) and a separate Appeal Brief (20 November 2008) have been filed during prosecution, and in both cases, prosecution has been re-

opened. In view of this protracted prosecution history, Applicant has made the amendments included herein. Applicant respectfully requests that the Examiner respond in kind.

With further respect to rejections under 35 U.S.C. 103(a), Applicant respectfully submits that Ramachandran and Hay fail to teach or suggest each and every feature of claim 1. For example, Ramachandran fails to teach or suggest, among other things, "...the physical security system includes a proxy server module for comparing only an incomplete portion of an IP address obtained from a received message against only a like incomplete portion of the reference IP address for the logged in user." (Claim 1). In the latest Office Action, Examiner Tolentino argues that the language, "comparing only a portion of an IP address obtained from a received message against only a like portion of the reference IP address for the logged in user" may be interpreted as comparing an entire IP address against an entire reference IP address. (Office Action at 3, 5-8; *See*, Applicant's previously presented claim 1). Applicants respectfully submit that Examiner Tolentino ignores the plain meaning of the term "portion." For example, Merriam-Webster's online dictionary has as its first entry for the term "portion", "an individual's part or share of something." (*See*, Merriam Webster's online dictionary, "portion", *available at* <http://www.merriam-webster.com/dictionary/portion>). Applicant respectfully submits that a "portion" should be interpreted as something less than a whole; as an incomplete or limited part of a whole. In this case, Applicants respectfully submit that, "comparing only a portion of an IP address obtained from a received message against only a like portion of the reference IP address for the logged in user" should be interpreted as comparing two like portions of IP addresses, where those like portions are less than the respective entire IP addresses to which the portions belong.

However, as Examiner Tolentino disagrees with Applicant's argument, Applicant has amended the claims to clarify that incomplete IP addresses are being compared. (Claim 1). Applicant respectfully requests that the Examiner apply the appropriate meaning of this language during examination. To that end, Applicant respectfully submits that Ramachandran and Hay fail to teach or suggest, among other things, "...wherein the physical security system includes a proxy server module for comparing only an incomplete portion of an IP address obtained from a received message against only a like incomplete portion of the reference IP address for the logged in user..." (Claim 1). At best, Hay describes a system that, "determines if the command originated from an authorized internet protocol (IP) address." (Hay at para. 12; *See*, Office Action at 3, 5-8). Applicant respectfully submits that this general reference to authorizing an IP address is insufficient to show the above-mentioned features of claim 1. Further, Examiner Tolentino fails to show Ramachandran overcomes the deficiencies of Hay. (*See generally*, Ramachandran; *See also*, Office Action, citing throughout to a single summary paragraph of Ramachandran). Accordingly, Applicant respectfully submits that the rejection of claim 1 under 35 U.S.C. 103(a) is improper, and requests withdrawal of the rejection.

With respect to claim 7, Applicant submits that the proposed combination of Ramachandran and Hay fails to teach or suggest "[a] method of authenticating a user accessing an Internet server..." that includes all the features claimed therein. For example, for reasons stated in the discussion of the proposed combination of Ramachandran and Hay above, Applicant submits that the proposed combination of Ramachandran and Hay fails to teach or suggest the method of claim 7, including "...the determining of the IP address including examining only an incomplete portion of the IP address of the requesting user and determining if the incomplete portion matches only a like incomplete portion of the reference IP address." As a result,

Applicant respectfully requests withdrawal of the rejections of claim 7 as allegedly being unpatentable over Ramachandran and Hay.

With respect to claim 11, Applicant submits that the proposed combination of Ramachandran and Hay fails to teach or suggest “[a] program product... for providing security for an Internet server...” that includes all the features claimed therein. For example, for reasons stated in the discussion of the proposed combination of Ramachandran and Hay above, Applicant submits that the proposed combination of Ramachandran and Hay fails to teach or suggest the program product of claim 11, including “...the component for processing IP address information includes a proxy server module for comparing only an incomplete portion of an IP address obtained from a received message against only a like incomplete portion of the reference IP address for the logged in user.” As a result, Applicant respectfully requests withdrawal of the rejections of claim 11 as allegedly being unpatentable over Ramachandran and Hay.

Muratov fails to overcome the deficiencies of Ramachandran and Hay, discussed above. As such, Applicant respectfully requests withdrawal of rejections based upon any and all combinations of Muratov, Ramachandran and Hay.

The dependent claims are believed allowable for the same reasons stated above, as well as for their own additional features.

Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Examiner’s interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Examiner’s analysis, combinations, and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Examiner’s combinations and

modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

Should the Examiner believe that anything further is necessary in order to place the application in better condition for allowance, the Examiner is requested to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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